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13 **UNITED STATES BANKRUPTCY COURT**  
14 **NORTHERN DISTRICT OF CALIFORNIA**  
15 **SAN FRANCISCO DIVISION**

16 In re:

17 PG&E CORPORATION,

18 - and -

19 PACIFIC GAS AND ELECTRIC  
20 COMPANY,

21 Debtors.

22 Affects PG&E Corporation

23 Affects Pacific Gas and Electric Company

24  Affects both Debtors

25 \* *All papers shall be filed in the Lead Case,*  
26 *No. 19-30088 (DM)*

Case No. 19-30088 (DM) (Lead Case)  
(Jointly Administered)

Chapter 11

**THE JIBEI CLAIMANTS' JOINDER AND  
STATEMENT IN SUPPORT OF THE  
PGIM FI CLAIMANTS' RESPONSE AND  
OPPOSITION TO REORGANIZED  
DEBTORS' ELEVENTH SECURITIES  
CLAIMS OMNIBUS OBJECTION  
(CLAIMS BARRED BY THE STATUTE  
OF REPOSE)**

**Hearing Information:**

Date: September 14, 2021  
Time: 10:00 a.m. (Pacific Time)  
Place: (Telephone Appearances Only)  
United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

Individual Claimants Annuity Plan of the Electrical Industry, Electrical Employers Self Insurance Safety Plan, Employees Security Fund of the Electrical Products Industries Health & Welfare, and Legal Services Plan of the Electrical Industry (“**JIBEI Claimants**”) hereby file this joinder and statement (the “**Joinder**”) in support of the PGIM FI Claimants’ Response and Opposition to Reorganized Debtors’ Eleventh Securities Claims Omnibus Objection (the “**Response and Opposition**”).

## **JOINDER**

The JIBEI Claimants hereby join the Response and Opposition. The JIBEI Claimants support, adopt and incorporate by reference the arguments made therein.<sup>1</sup>

## **RESERVATION OF RIGHTS**

The JIBEI Claimants reserve all of their respective rights, claims, defenses, and remedies, including, without limitation, the right to amend, modify, or supplement this Joinder in accordance with applicable rules.

Dated: August 31, 2021

ROLNICK KRAMER SADIGHI LLP

By: 

RICHARD A. BODNAR

## *Attorneys for the JIBEI Claimants*

<sup>1</sup> In conformance with the ADR Procedures adopted by this Court, the JIBEI Claimants provide Appendix A, listing information relevant to their claims, including claim numbers.

## APPENDIX A

CREDITOR	CLAIM NO.	DATE	AMOUNT OF CLAIM	NOTICE ADDRESS
Annuity Plan of the Electrical Industry	101683	4/16/2020	Unliquidated	Richard A. Bodnar Rolnick Kramer Sadighi LLP 1251 Avenue of the Americas New York, New York 10020 212.597.2800 <a href="mailto:rbodnar@rksllp.com">rbodnar@rksllp.com</a>
Electrical Employers Self Insurance Safety Plan	100193	4/15/2020	Unliquidated	Richard A. Bodnar Rolnick Kramer Sadighi LLP 1251 Avenue of the Americas New York, New York 10020 212.597.2800 <a href="mailto:rbodnar@rksllp.com">rbodnar@rksllp.com</a>
Employees Security Fund of the Electrical Products Industries Health & Welfare	99659	4/15/2020	Unliquidated	Richard A. Bodnar Rolnick Kramer Sadighi LLP 1251 Avenue of the Americas New York, New York 10020 212.597.2800 <a href="mailto:rbodnar@rksllp.com">rbodnar@rksllp.com</a>
Legal Services Plan of the Electrical Industry	100084	4/15/2020	Unliquidated	Richard A. Bodnar Rolnick Kramer Sadighi LLP 1251 Avenue of the Americas New York, New York 10020 212.597.2800 <a href="mailto:rbodnar@rksllp.com">rbodnar@rksllp.com</a>